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July 10, 1995

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Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: MM Docket No. 94-150;  
MM Docket No. 92-51; and  
MM Docket No. 87-154

Dear Mr. Caton:

Submitted herewith for filing, on behalf of our client, Malrite Communications Group, Inc., are an original and nine copies of its Reply Comments Of Malrite Communications Group, Inc. in the above-referenced rulemaking proceeding, involving review of the Commission's regulations governing television broadcasting.

Please direct any inquiries concerning this submission to the undersigned.

Respectfully submitted,

KAYE, SCHOLER, FIERMAN, HAYS &  
HANDLER

By: Irving Gastfreund  
Irving Gastfreund

Enclosures

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BEFORE THE  
**Federal Communications Commission**

WASHINGTON, D.C. 20554

RECEIVED  
JUL 10 1995  
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OFFICE OF SECRETARY

In the Matter of

Review of the Commission's  
Regulations Governing Attribution  
Of Broadcast Interests

MM Docket No. 94-150

Review of the Commission's  
Regulations and Policies Affecting  
Environment in the Broadcast  
Industry

MM Docket No. 92-51

Reexamination of the Commission's  
Cross-Interest Policy

MM Docket No. 87-154

TO: The Commission

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REPLY COMMENTS OF  
MALRITE COMMUNICATIONS GROUP, INC.

MALRITE COMMUNICATIONS GROUP, INC. ("Malrite"), by its attorneys, pursuant to Sections 1.415 and 1.419 of the Commission's Rules, hereby submits its instant Reply Comments in response to the Commission's Notice of Proposed Rule Making, \_\_\_\_\_ FCC Rcd \_\_\_\_\_, FCC 94-324 (released January 12, 1995), in the above-captioned consolidated proceedings.

Malrite is the licensee of Television Stations WXIX-TV, Newport, Kentucky (operating in the Cincinnati, Ohio television market); and WFLX-TV, West Palm Beach, Florida. In addition, Malrite is the controlling shareholder of Malrite of Ohio, Inc., licensee of Television Station WOIO (TV), Shaker Heights, Ohio

(which operates in the Cleveland, Ohio television market). Moreover, Malrite of Ohio, Inc., has entered into a Local Marketing Agreement ("LMA") with the licensee of Television Station WUAB(TV), Channel 43, Lorain, Ohio, pursuant to which Malrite provides programming for broadcast on WUAB(TV). In addition, Malrite is the controlling stockholder in Estrella Brillante, Inc., which is the controlling General Partner of Estrella Brillante Limited Co-Partnership, which is the licensee of Television Stations WLII-TV, Caguas, Puerto Rico; and WSUR-TV, Ponce, Puerto Rico. Based on the foregoing, Malrite has a significant interest in the Commission's determinations in this rulemaking proceeding, since the Commission's resolution of the issues in these consolidated proceedings will have profound consequences for the future of television broadcasting in this country.

In its Notice of Proposed Rule Making in this proceeding (at ¶11), the Commission referred to the television ownership proceeding, MM Docket No. 91-221, and specifically indicated that it would review the comments filed in that proceeding in conjunction with the comments received in the instant proceedings to assure a coordinated approach to all of these proceedings. In

this connection, Malrite hereby incorporates by reference its May 17, 1995 Comments in MM Docket No. 91-221 and MM Docket No. 87-8, and incorporates herein by reference its Reply Comments of this date in that same consolidated rulemaking proceeding.

Respectfully submitted,

MALRITE COMMUNICATIONS GROUP, INC.

By: 

Jason L. Shrinsky

By: 

Irving Gastfreund

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Its Attorneys

July 10, 1995